

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THE PEOPLE OF THE STATE OF)	
ILLINOIS,)	
)	
Plaintiff,)	Case No. 08CV4210
)	
v.)	Judge Elaine E. Bucklo
)	
COUNTRYWIDE FINANCIAL)	
CORPORATION, COUNTRYWIDE HOME)	
LOANS, INC., FULL SPECTRUM)	
LENDING, COUNTRYWIDE HOME)	
LOANS SERVICING LP, and ANGELO)	
MOZILO,)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION TO STAY
PENDING RESOLUTION OF MOTION BEFORE JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION TO TRANSFER
AND COORDINATE OR CONSOLIDATE THIS AND RELATED CASES**

Defendants Countrywide Financial Corporation, Countrywide Home Loans, Inc., Full Spectrum Lending, Countrywide Home Loans Servicing, LP, and Angelo Mozilo ("Defendants") hereby move to stay all proceedings in this case until the Judicial Panel on Multidistrict Litigation ("MDL Panel") resolves a motion for transfer and consolidation or coordination pertaining to this case under 28 U.S.C. § 1407. At present, at least six actions (including this one) sharing common issues of fact are pending in this Court and in two federal district courts in California. Those actions are subject to a motion before the MDL Panel to transfer the actions for consolidated or coordinated pretrial proceedings to the Central District of California. A temporary stay of proceedings here would help achieve an orderly transfer of the actions for coordinated or consolidated proceedings before a single federal judge.

As is detailed in the accompanying memorandum, this Court has inherent the power to stay proceedings. In the present circumstances, it is common practice to issue stay orders pending the MDL Panel's resolution of a motion to transfer and coordinate or consolidate cases. A stay would conserve judicial resources, avoid prejudice to the parties, and prevent duplicative or inconsistent rulings. Before filing this motion, counsel for Defendants met and conferred with Plaintiff to seek Plaintiff's agreement to a stay, and Plaintiff declined.

Respectfully submitted,

Dated: August 14, 2008

/s/ Tyrone C. Fahner
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 14, 2008, he caused a copy of the foregoing Notice of Motion, together with Defendants' Motion to Stay, to be served on counsel of record for Plaintiff, pursuant to Electronic Case Filing.

/s/ Andrew J. Schaefer
